

ORIGINAL
FILE

RECEIVED

DEC 26 1991

FCC MAIL BRANCH

RECEIVED

DEC 26 1991

Federal Communications Commission
Office of the Secretary

December 21, 1991

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

RE: PETITION FOR RULE MAKING -- RM-7869

Dear Ms. Searcy,

I enclose five copies and one original of my comments to RM-7869. Please see that each commissioner receives a copy. Thank you for your attention in this matter.

Sincerely,

[Handwritten signature]

RECEIVED

DEC 26 1991

Federal Communications Commission
Office of the Secretary

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of:
Amendment of Part 97 of the
Commission's Rules Governing
Amateur Radio Services
Regarding Repeater and
Auxiliary Operation in the
1.25 Meter Band

RECEIVED
DEC 26 1991
FCC MAIL BRANCH

To: The Commission

PETITION FOR RULE MAKING

I, Mikel P. Shirley, WB6WUI, hereby respectfully request this Commission **NOT** to take action on this Petition for Rule Making, RM-7869, as submitted by the American Radio Relay League.

The ARRL's pursuit of this change is not in the best interest of the 1.25 meter Amateur band. Adoption of this petition would be counterproductive to the current use of this proposed sub-band when measured against the FCC's own efforts at "Novice enhancement" and the most recent 40% reduction in the 1.25 meter band.

The ARRL is requesting a 100% larger sub-band in the 1.25 meter band than currently in effect on the 6 meter and 2 meter bands. On a band now recently reduced 40%, an shallow proposal to gain a larger sub-band. If one were to factor in the increased loading of

the band due to the FCC's approval of the "Novice Enhancement", it becomes apparent that this petition is faulty.

It is wholly inappropriate to force additional repeaters off the air (again) only to allot exclusive precious spectrum for a mode that

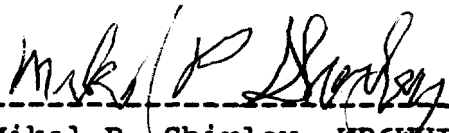
is not even a part of the amateur service. The use of the

than the reverse. It would be counter-productive to eliminate scores of repeaters already crowded onto a band recently almost halved by the FCC just 4 months ago.

The ARRL also states in their petition that they "merely seek to restore the status quo". I would like to have the FCC restore 40% of the ~~band removed~~ from the Amateur Service also. But that is not realistic. Nor is this petition. The FCC's recent action forever changed that. The petition is not an unbiased attempt to rectify the loss of 2 Mhz. of amateur spectrum.

These are but a few of the reasons I, as a 17 year Ham, and daily user of the 1.25 meter band, strongly oppose the ARRL's petition for creation of this sub-band.

Respectfully Submitted,



Mikel P. Shirley, WB6WUI
P.O. Box 460
Lakeside, CA 92040-0460